



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 8**

1595 Wynkoop Street
DENVER, CO 80202-1129
Phone 800-227-8917
<http://www.epa.gov/region08>

JUN 12 2014

Ref: EPR-N

Melany Glossa, Forest Supervisor
Beaverhead-Deerlodge National Forest
U.S. Forest Service
420 Barrett Street
Dillon, MT 59725

Re: Beaverhead-Deerlodge National Forest Land
and Resource Management Plan Compliance with
District of Montana Court Order - Draft
Supplemental Environmental Impact Statement
CEQ # 20140064

Dear Ms. Glossa:

In accordance with our responsibilities under Section 102(2)(C) of the National Environmental Policy Act (NEPA), and Section 309 of the Clean Air Act (CAA), the U.S. Environmental Protection Agency Region 8 has reviewed the March 14, 2014 Draft Supplemental Environmental Impact Statement (Draft SEIS) by the U.S. Forest Service (USFS) for the Beaverhead-Deerlodge National Forest (BDNF) Land and Resource Management Plan (LRMP).

Project Description and Background

In a May 24, 2013 Order, the U.S. District Court for the District of Montana directed the USFS to supplement the 2009 Corrected Final Environmental Impact Statement (EIS) for the BDNF LRMP to explain or support its decision to exclude temporary roads from the Forest Plan road density goals. This Draft SEIS evaluates the effect of not including temporary roads in Open Motorized Road and Trail Density goals on Forest Plan EIS issues.

Comments and Recommendations

Surface Water Resources

The EPA notes in the Draft SEIS the number of temporary roads constructed and/or closed for timber harvest, mineral exploration, recreation and travel management since the 2009 BDNF LRMP was completed. The EPA appreciates that the USFS documented a current trend toward fewer miles of construction of new temporary roads, reclamation of unused roads and decommissioning and/or obliteration of unused roads in the Draft SEIS. A trend toward less

temporary road development, more road decommissioning and reclamation of unused roads can generally be expected to improve aquatic resources, water quality and critical habitat protection.


The Draft SEIS does not currently include information on how many streams have improved since the 2009 BDNF LRMP was completed. We recommend the Final SEIS includes an updated characterization of these resources, including: a list of key watersheds that have been improved and are no longer in "poor" condition with low geomorphic, hydrologic, & biotic integrity since 2009; a list of the number of water bodies in the BDNF whose status has been removed from the MDEQ 303(d) list of impaired waters since 2009; and a summary and strategic approach of how, and which, additional key watershed restoration efforts have and will be initiated and/or completed in the BDNF.

EPA's Rating

Consistent with Section 309 of the CAA, it is the EPA's responsibility to provide an independent review and evaluation of the potential environmental impacts of this Draft SEIS. Based on our review, the EPA is rating the Draft SEIS Preferred Alternative as "Environmental Concerns – Insufficient Information" (EC-2). The "EC" rating means that the EPA's review has identified potential impacts that can be avoided in order to fully protect the environment. The "2" rating means that the Draft SEIS does not contain sufficient information for the EPA to fully assess environmental impacts. We recommend that additional information, data, analyses, or discussion be included in the Final SEIS. A full description of the EPA's rating system may be found at: <http://www.epa.gov/compliance/nepa/comments/ratings.html>.

Thank you for the opportunity to comment on the Draft SEIS. If we may provide further explanation of our comments, please contact me at 303-312-6704. You may also contact Nat Miullo, lead reviewer for this project, at 303-312-6233, or miullo.nat@epa.gov.

Sincerely,


for Philip S. Strobel

Acting Director, NEPA Compliance and Review Program
Office of Ecosystem Protection and Remediation

cc: Julie DalSoglio, Director, EPA Montana Office
Darrin Kron, Section Manager, MT Department of Environmental Quality